

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X
APRIL GLENN,

Plaintiff,

Index No.: _____/19

Date Filed: _____/19

SUMMONS

-against-

Plaintiff designates Bronx
County as the place of trial.THE CITY OF NEW YORK, BOARD OF EDUCATION OF
THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK,
THE BOARD OF EDUCATION OF THE CITY OF NEW YORK,
THE NEW YORK CITY DEPARTMENT OF EDUCATION,
and RAYMOND FARRELL,

Basis of venue: CPLR 504(3)

Defendants.
-----X

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
November 15, 2019Yours etc.,
GAIR, GAIR, CONASON, RUBINOWITZ, BLOOM,
HERSHENHORN, STEIGMAN & MACKAUF
Attorneys for PlaintiffPETER J. SAGHIR
80 Pine Street, 34th Floor
New York, New York 10005
(212) 943-1090

TO: See Attached Service Rider

SERVICE RIDER

THE CITY OF NEW YORK
100 Church Street
New York, NY 10007

BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK
52 Chambers Street
New York, NY 10007

THE BOARD OF EDUCATION OF THE CITY OF NEW YORK
52 Chambers Street
New York, NY 10007

THE NEW YORK CITY DEPARTMENT OF EDUCATION
52 Chambers Street
New York, NY 10007

RAYMOND FARRELL
225 Maple Pkwy APT A
Staten Island, NY 10303

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
APRIL GLENN,

Index No.: _____/19

Plaintiff,

VERIFIED COMPLAINT

-against-

THE CITY OF NEW YORK, BOARD OF EDUCATION OF
THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK,
THE BOARD OF EDUCATION OF THE CITY OF NEW YORK,
THE NEW YORK CITY DEPARTMENT OF EDUCATION,
and RAYMOND FARRELL,

Defendants.
-----X

Plaintiff, complaining of the defendants, by and through her attorneys, GAIR,
GAIR, CONASON, RUBINOWITZ, BLOOM, HERSHENHORN, STEIGMAN & MACKAUF,
respectfully shows to this Court and alleges as follows:

1. Upon information and belief, that at all times herein mentioned, defendant, THE
CITY OF NEW YORK, was and still is a municipal corporation duly organized and existing
under and by virtue of the laws of the State of New York.

2. Upon information and belief, that at all times herein mentioned, defendant, THE
CITY OF NEW YORK, owned a school known as Taft High School located at 240 E 172nd
Street, Bronx, NY 10457.

3. Upon information and belief, that at all times herein mentioned, defendant, THE
CITY OF NEW YORK, its agents, servants and employees managed, maintained, operated and
controlled the aforesaid school known as Taft High School located at 240 E 172nd Street, Bronx,
NY 10457.

4. Upon information and belief, that at all times herein mentioned, defendant, THE

CITY OF NEW YORK, held itself out to the public as the owner of Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

5. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

6. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, was and still is a municipal corporation duly organized and existing under and by virtue of the laws of the State of New York.

7. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, is an agency of defendant, THE CITY OF NEW YORK.

8. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, its agents, servants and employees managed, maintained, operated and controlled defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK.

9. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, owned a school known as Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

10. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW

YORK, its agents, servants and employees managed, maintained, operated and controlled the aforesaid school known as Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

11. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, held itself out to the public as the owner of Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

12. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

13. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, was and still is a municipal corporation duly organized and existing under and by virtue of the laws of the State of New York.

14. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, is an agency of defendant, THE CITY OF NEW YORK.

15. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, its agents, servants and employees managed, maintained, operated and controlled defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK.

16. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, owned a school known as Taft

High School located at 240 E 172nd Street, Bronx, NY 10457.

17. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, its agents, servants and employees managed, maintained, operated and controlled the aforesaid school known as Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

18. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, held itself out to the public as the owner of Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

19. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

20. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, was and still is a municipal corporation duly organized and existing under and by virtue of the laws of the State of New York.

21. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, is an agency of defendant, THE CITY OF NEW YORK.

22. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, its agents, servants and employees managed, maintained, operated and controlled defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION.

23. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, owned a school known as Taft High

School located at 240 E 172nd Street, Bronx, NY 10457.

24. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, its agents, servants and employees managed, maintained, operated and controlled the aforesaid school known as Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

25. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, held itself out to the public as the owner of Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

26. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

27. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was a teacher at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

28. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, had an office on the premises of Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

29. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting as an agent of defendant, THE CITY OF NEW YORK.

30. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was an employee of defendant, THE CITY OF NEW YORK.

31. Upon information and belief, that at all times herein mentioned, defendant,

RAYMOND FARRELL, was acting in the course and scope of his employment with defendant, THE CITY OF NEW YORK.

32. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, hired defendant, RAYMOND FARRELL.

33. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, retained defendant, RAYMOND FARRELL.

34. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, supervised defendant, RAYMOND FARRELL.

35. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting as an agent of defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK.

36. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was an employee of defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK.

37. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting in the course and scope of his employment with defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK.

38. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, hired defendant, RAYMOND FARRELL.

39. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW

YORK, retained defendant, RAYMOND FARRELL.

40. Upon information and belief, that at all times herein mentioned, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, supervised defendant, RAYMOND FARRELL.

41. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting as an agent of defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK.

42. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was an employee of defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK.

43. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting in the course and scope of his employment with defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK.

44. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, hired defendant, RAYMOND FARRELL.

45. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, retained defendant, RAYMOND FARRELL.

46. Upon information and belief, that at all times herein mentioned, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, supervised defendant, RAYMOND FARRELL.

47. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting as an agent of defendant, THE NEW YORK CITY

DEPARTMENT OF EDUCATION.

48. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was an employee of defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION.

49. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was acting in the course and scope of his employment with defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION.

50. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, hired defendant, RAYMOND FARRELL.

51. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, retained defendant, RAYMOND FARRELL.

52. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, supervised defendant, RAYMOND FARRELL.

53. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, was responsible for the staffing and hiring at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

54. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, did the hiring and staffing at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

55. Upon information and belief, that at all times herein mentioned, defendant,

BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, was responsible for the staffing and hiring at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

56. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, did the hiring and staffing at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

57. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, was responsible for the staffing and hiring at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

58. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, did the hiring and staffing at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

59. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, was responsible for the staffing and hiring at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

60. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, did the hiring and staffing at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

61. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, had complaints of sexual abuse made against him.

62. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees knew or should have known of the aforesaid complaints of

sexual abuse against defendant, RAYMOND FARRELL.

63. Upon information and belief, that at all times herein mentioned, defendant, RAYMOND FARRELL, was a known sexual abuser of children.

64. Upon information and belief, that at all times herein mentioned, defendant, THE CITY OF NEW YORK, received complaints that defendant, RAYMOND FARRELL, had been a sexual abuser of children.

65. Upon information and belief, that at all times herein mentioned, defendant, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, received complaints that defendant, RAYMOND FARRELL, had been a sexual abuser of children.

66. Upon information and belief, that at all times herein mentioned, defendant, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, received complaints that defendant, RAYMOND FARRELL, had been a sexual abuser of children.

67. Upon information and belief, that at all times herein mentioned, defendant, THE NEW YORK CITY DEPARTMENT OF EDUCATION, received complaints that defendant, RAYMOND FARRELL, had been a sexual abuser of children.

68. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that defendant, RAYMOND FARRELL, had been the subject of complaints of sexual abuse.

69. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that defendant, RAYMOND FARRELL, was a known sexual abuser of children.

70. Upon information and belief, that at all times herein mentioned, defendants, their

agents, servants and employees, could reasonably have anticipated that defendant, RAYMOND FARRELL's, sexual abuse complaints and sexual abuse of children would be likely to result in injury to others.

71. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to investigate the aforesaid complaints against defendant, RAYMOND FARRELL.

72. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to properly, adequately and thoroughly investigate the aforesaid complaints against defendant, RAYMOND FARRELL.

73. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to report or refer the aforesaid complaints made against defendant, RAYMOND FARRELL, to the police or any other agency to be investigated.

74. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees carelessly, negligently and recklessly ignored and dismissed the aforesaid complaints against defendant, RAYMOND FARRELL.

75. Upon information and belief, that at all times herein mentioned, the aforesaid complaints against defendant, RAYMOND FARRELL, had merit.

76. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that the aforesaid complaints against defendant, RAYMOND FARRELL, had merit.

77. That at all times herein mentioned, defendants, THE CITY OF NEW YORK, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, and, THE NEW

YORK CITY DEPARTMENT OF EDUCATION, failed to establish policies and procedures directed towards protecting minors from sexual abuse.

78. That at all times herein mentioned, plaintiff, APRIL GLENN, was enrolled as a student at Taft High School located at 240 E 172nd Street, Bronx, NY 10457.

79. From approximately 1994 to 1995, defendant, RAYMOND FARRELL, sexually abused plaintiff, APRIL GLENN, while plaintiff was still an infant, on school property at Taft High School located at 240 E 172nd Street, Bronx, NY 10457, and other locations.

80. The aforesaid abuse constituted a sexual offense as defined in article one hundred thirty of the penal law committed against a child less than eighteen years of age, or the use of a child in a sexual performance as defined in section 263.05 of the penal law, or a predecessor statute that prohibited such conduct at the time of the act, which conduct was committed against a child less than eighteen years of age.

81. From approximately 1994 to 1995 defendants, their agents, servants and employees knew or should have known that defendant, RAYMOND FARRELL, was sexually abusing plaintiff, APRIL GLENN, while plaintiff was still an infant.

82. From approximately 1994 to 1995 defendants, their agents, servants and employees knew or should have known that defendant, RAYMOND FARRELL, was sexually abusing plaintiff, APRIL GLENN, while plaintiff was still an infant, on school property at Taft High School located at 240 E 172nd Street, Bronx, NY 10457, and other locations.

83. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees knew or should have known that the sexual abuse by defendant, RAYMOND FARRELL, of plaintiff, APRIL GLENN, while plaintiff was still an infant, was ongoing.

84. Defendants, THE CITY OF NEW YORK, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, and, THE NEW YORK CITY DEPARTMENT OF EDUCATION, trained and instructed defendant, RAYMOND FARRELL, for his employment at Taft High School.

85. Upon information and belief, that at all times herein mentioned defendant, RAYMOND FARRELL, was under the direct supervision and control of defendants, THE CITY OF NEW YORK, BOARD OF EDUCATION OF THE CITY SCHOOL DISTRICT OF THE CITY OF NEW YORK, THE BOARD OF EDUCATION OF THE CITY OF NEW YORK, and, THE NEW YORK CITY DEPARTMENT OF EDUCATION, when he performed the wrongful acts described herein.

86. That on or about July 3, 1996, defendant, RAYMOND FARRELL, was sentenced to prison for, among other things, multiple counts of rape, the use of a child in a sexual performance, and sodomy.

87. That the aforesaid occurrences were caused or contributed to by the negligence, carelessness and recklessness and the willful, wanton, and grossly negligent conduct of the defendants, their agents, servants and/or employees, in: selecting, hiring, contracting and retaining defendant, RAYMOND FARRELL, to work with the plaintiff while plaintiff was still an infant and other children when it was known or should have been known to the defendants herein that defendant, RAYMOND FARRELL, had a history of complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children; selecting, hiring, contracting and retaining defendant, RAYMOND FARRELL, when it was known or should have been known to the defendants herein that he did not possess the requisite skills or

qualifications to work with children; failing to properly and adequately supervise the conduct of defendant, RAYMOND FARRELL, as it related to the plaintiff while plaintiff was still an infant and other children when it was known or should have been known to the defendants herein that defendant, RAYMOND FARRELL, had a history of complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children; failing to warn or advise the plaintiff, who was still an infant, her parents and others of defendant, RAYMOND FARRELL's, propensity to sexually abuse children and of the fact that he had sexually abused children whom he came in contact with by and through his roles at Taft High School; causing, permitting and allowing the sexual abuse to continue; failing to take any measures to stop the sexual abuse when it was known or should have been known to the defendants herein that the sexual abuse was continuing and ongoing; failing to establish adequate and effective professional training and educational programs and procedures for their employees calculated to prevent the sexual abuse of children; failing to implement any measures or take any steps to prevent defendant, RAYMOND FARRELL, from sexually abusing the plaintiff while the plaintiff was still an infant when it was known or should have been known to the defendants herein that defendant, RAYMOND FARRELL, had a history of complaints of sexual abuse made against him and a propensity to sexually abuse children and in fact had sexually abused children; failing to make any inquiry into the background of defendant, RAYMOND FARRELL, before selecting, hiring, contracting and retaining him; failing to make any inquiry into the background of defendant, RAYMOND FARRELL, before selecting, hiring, contracting and retaining him when it was known or should have been known before he was hired that defendant, RAYMOND FARRELL, had a propensity to sexually abuse children and had a history of complaints made against him; failing to use reasonable care to correct and remove defendant, RAYMOND

FARRELL, and continuing to retain him when it was known or should have been known to the defendants herein that defendant, RAYMOND FARRELL, had a history of complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children and was sexually abusing children and that continuing to retain him would be likely to result in injury to others, including the plaintiff while plaintiff was still an infant; causing, permitting and allowing the plaintiff to be sexually abused while plaintiff was still an infant; and in otherwise being careless, negligent and reckless.

88. By reason of the forgoing, plaintiff, APRIL GLENN, sustained physical and psychological injuries, including but not limited to, severe emotional distress, humiliation, fright, dissociation, anger, depression, anxiety, family turmoil, a severe shock to her nervous system, certain internal injuries and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and plaintiff, APRIL GLENN, has been forced to abstain from the duties of her vocation, and has and/or will become obligated to expend sums of money for medical expenses.

89. That the amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

90. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(5), 1602(7) and 1602(11).

WHEREFORE, the plaintiff demands judgment against the defendants, together with compensatory damages, together with the interest, cost, and disbursements pursuant to the causes of action herein.

Dated: New York, New York
November 15, 2019

Yours etc.,
GAIR, GAIR, CONASON, RUBINOWITZ, BLOOM,
HERSHENHORN, STEIGMAN & MACKAUF
Attorneys for Plaintiff



PETER J. SAGHIR
80 Pine Street, 34th Floor
New York, New York 10005
(212) 943-1090

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

PETER J. SAGHIR, an attorney at law licensed to practice in the courts of the State of New York, states that affirmant is a partner with the firm of Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman & Mackauf, attorneys for the plaintiff in the within action; that affirmant has read the foregoing

VERIFIED COMPLAINT

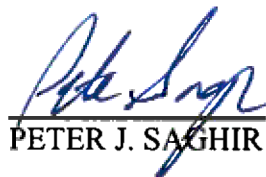
and knows the contents thereof; and that the same is true to affirmant's own knowledge except as to those matters therein stated to be alleged on information and belief and that as to those matters, affirmant believes them to be true.

Affirmant further states that the reason this verification is made by affirmant and not by the plaintiff is that the plaintiff is not within the County wherein affirmant maintains his office.

The grounds of affirmant's belief are investigation and data in affirmant's possession and consultations had with the plaintiff.

The undersigned affirms that the foregoing statements are true under penalty of perjury.

Dated: New York, New York
November 15, 2019


PETER J. SAGHIR